Ticketmaster LLC v. RMG Technologies Inc et al

Doc. 104

LLC ("Ticketmaster") to permit inspection by RMG of documents and electronically stored information. Specifically, RMG seeks an order requiring 2 Ticketmaster to: (1) produce all unprivileged documents requested; (2) provide 3 amended responses to the requests; and (3) produce all unprivileged documents and 4 electronically stored information covered by the requests set forth herein. 5 Prior to filing this Motion, the parties have met and conferred pursuant to 6 7 Local Rule 37-1 and made a good faith attempt to resolve this dispute but were 8 unable to do so. This Motion to compel is based upon this notice, the concurrently filed Joint 10 Stipulation Regarding Defendant's Motion to Compel the Production of Documents. 11 the declarations of David N. Tarlow and Raaqim Knight, the pleadings and records 12 on file in this action and such other matters as the Court deems necessary and 13 proper. April 1, 2008 14 Dated: COGGAN & TARLOW 15 16 By: 17 Attorneys for Defendant 18 RMG TECHNOLOGIES, INC. 19 20 21 22 23

24

25

26

27

28

PROOF OF SERVICE

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
ss:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 1925 Century Park East, #2320, Los Angeles, California 90067

On April 1, 2008, I served the foregoing document described as (1) RMG TECHNOLOGIES, INC.'S NOTICE OF MOTION TO COMPEL PRODUCTION OF DOCUMENTS; AND (2) JOINT STIPULATION REGARDING DEFENDANT'S MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS on all interested parties in this action by placing true copies thereof, enclosed in sealed envelopes, and addressed as follows:

Robert H. Platt
Mark Lee
Donald R. Brown
Raaqim Knight
Manatt, Phelps & Phillips, LLP
11355 W. Olympic Blvd.
Los Angeles, CA 90064

(X) BY PERSONAL SERVICE, I caused such envelope to be delivered by hand to the above-named addressee(s).

I declare under penalty of perjury that I am an employee of a member of the bar of this court at whose direction that the service herein was made.

Executed on this 1^{ST} day of April, 2008, at Los Angeles, California.

BAVID N. TARLOW